

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

MANUFACTURERS AND TRADERS
TRUST COMPANY,

Defendant.

STIPULATION [AND PROPOSED ORDER] TO STAY LITIGATION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, subject to the approval of the Court, that the above-captioned matter will be stayed until the final resolution of the appeal filed May 13, 2014 in *Intellectual Ventures I LLC v. Capital One Financial*, United States Court of Appeals for the Federal Circuit Case No. 14-1506, of the final judgment entered in Case No. 1:13-cv-740 in the United States District Court for the Eastern District of Virginia, Alexandria Division on April 22, 2014 (D.I. 376), and of the Order and Opinion granting summary judgment to defendants in that action on April 16, 2014 (D.I. 371 & 372), finding invalid, *inter alia*, the Patent-in-Suit in the above-captioned matter.

Dated February 6, 2015

Respectfully submitted,

/s/Brian E. Farnan

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IT IS SO ORDERED this _____ day of _____, 2015.

The Honorable Sue L. Robinson